## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Case No.: 19-21086-JAD

Samuel E. Miller, Chapter 13

Debtor.

### NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to Rule 9010 of the Bankruptcy Rules, TOWNSHIP OF STOWE, is a creditor and hereby appears in this case.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 2002 of the Bankruptcy Rules, the undersigned requests that all notices and papers specified by that Rule, and all other notices given or required to be given in this case and all other papers served or required to be served in this case, be given to and served upon:

Jeffrey R. Hunt, Esquire GOEHRING, RUTTER & BOEHM 437 Grant Street, 14<sup>th</sup> Floor Pittsburgh, PA 15219-6107 TEL: (412)281-0587 FAX: (412)281-6570

The foregoing request includes without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery telephone, telegraph, telex or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in the case, with respect to the (a) debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct.

PLEASE TAKE FURTHER NOTICE that the TOWNSHIP OF STOWE intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (1) its right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; or (2) any other rights, claims, actions, defenses, setoffs, or recoupments to which it may be entitled under any agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses setoff, and recoupments are expressly reserved.

Dated: May 8, 2019 GOEHRING, RUTTER & BOEHM

By: /s/ Jeffrey R. Hunt

Jeffrey R. Hunt, Esquire Pa. I.D. #90342 Frick Building, 14<sup>th</sup> Floor 437 Grant Street Pittsburgh, PA 15219 (412) 281-0587 Attorney for Movant jhunt@grblaw.com

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### **DECLARATION IN LIEU OF AFFIDAVIT**

I certify that this request supersedes any prior request for Notice by this creditor, that there is no other request to receive Notices for the specified creditor, and that I am authorized to make this request for Notices on behalf of the named creditor.

#### **GOEHRING, RUTTER & BOEHM**

By: /s/ Jeffrey R. Hunt

Jeffrey R. Hunt, Esquire Pa. I.D. #90342 Frick Building, 14<sup>th</sup> Floor 437 Grant Street Pittsburgh, PA 15219 (412) 281-0587 Attorney for Movant jhunt@grblaw.com

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# CERTIFICATE OF MAILING OF NOTICE OR OTHER DOCUMENT TO PARTIES IN INTEREST

Brian C. Thompson, Esquire Thompson Law Group, P.C. 125 Warrendale Bayne Road, Suite 200 Warrendale, PA 15086

> Ronda J. Winnecour, Esquire Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219

Office of the United States Trustee Liberty Center 1001 Liberty Avenue, Suite 970 Pittsburgh, PA 15222

#### GOEHRING, RUTTER & BOEHM

By: /s/ Jeffrey R. Hunt

Jeffrey R. Hunt, Esquire Pa. I.D. #90342 Frick Building, 14<sup>th</sup> Floor 437 Grant Street Pittsburgh, PA 15219 (412) 281-0587 Attorney for Movant jhunt@grblaw.com